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May 15, 2001

Federal Communications Commission
Office of the Secretary
455 12th St. S.W. TW-A235
Washington, DC 20554

Re: 5.9GHz DSRC Service Rules

To Whom It May Concern:

Please accept this submission in response to your office's request for comments on ITS America's 'Status Report on Licensing and Service Issues and Deployment Strategies for DSRC-Based ITS Services in the 5.850-5,925GHz Band.'

I apologize for the lack of DA number. I could not find such a number in the Public Notice sent to our offices by ITS America.

Thank you for your consideration.

Sincerely,



Timothy McGuckin
Director of Technology Programs

Enclosure: Comments

CC: International Transcription Services, Inc.
1231 20th Street, N. W.
Washington, D. C. 20036

Nancy M. Zaczek, Federal Communications Commission
Wireless Telecommunications Bureau
Public Safety and Private Wireless Division
Policy and Rules Branch
445 Twelfth Street, S. W., Room 4- C330
Washington, D. C. 20554.

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MATTER BEFORE THE

FEDERAL COMMUNICATIONS COMMISSION

OFFICE OF SECRETARY
445 12TH ST. S.W. TW-A235
Washington, DC 20554

COMMENTS ON THE ITS AMERICA "STATUS REPORT ON LICENSING AND
SERVICE ISSUES AND DEPLOYMENT STRATEGIES FOR DSRC-BASED ITS
SERVICES IN THE 5.850-5.925 GHZ BAND"

COMMENTS OF THE

**INTERNATIONAL BRIDGE, TUNNEL &
TURNPIKE ASSOCIATION
2120 L STREET NW SUITE 305
WASHINGTON DC 20037**

SUMMARY

IBTTA submits these comments in support of the petition for rule making filed 5/19/97 by the Intelligent Transportation Society of America (ITS America) seeking an allocation of 75 MHz of spectrum in the 5.850-5.925 GHz band for use by intelligent transportation systems. The securing of this frequency with respect to electronic tolling and traffic management would represent an accomplishment for the industry for the future.

This support is provided on condition that IBTTA member agencies and others with dedicated short-range communication systems (DSRC) and services utilized for electronic toll collection (ETC) do not involuntarily relinquish the current frequencies over which they are operating. Toll agencies should have preserved the freedom to exploit present systems to their fullest, both in terms of amortization of current investments and useful life of legacy systems.

IBTTA supports the FCC's position with regard to spectrum sharing, compatibility and efficiency, which is to rely on market forces and existing standards-setting activities to lead the way to a consensus on DSRC standards that will permit nationwide interoperability for selected DSRC operations.

BACKGROUND

IBTTA is the not-for-profit trade association representing the worldwide toll industry. Our members operate more than 250 facilities in 25 countries, carrying more than 8 billion vehicles each year.

Our US representation consists of more than 50 authorities operating 125 toll roads, bridges or tunnels. These facilities represent more than 4300 miles of roadway, serving some 3.29 billion vehicles, which traveled over 41 million miles on their facilities. Toll facilities are acknowledged as early leaders in the use of ITS through their deployment of DSRC devices in support of ETC. The first installations of these technologies occurred in Texas in 1988. Since then, the number has grown significantly as greater numbers of agencies adopt these technologies or plan to do so in the near future.

IBTTA supports toll financing as an effective alternative or supplement to traditional means of financing transportation infrastructure. Enactment of the Intermodal Surface Transportation Efficiency Act (ISTEA) and the Transportation Equity Act for the 21st Century recognized the important contributions toll financing and highway technology make

to improved regional and national mobility and productivity. Toll agencies require adequate radio spectrum to continue to keep on achieving these important objectives.

CONCERN: MAINTAIN FLEXIBILITY

IBTTA has expressed previously and does so now the concern that the adoption of changes proposed in the NPRM may disrupt ITS and ETC research and development by:

- promoting exclusivity while limiting available bandwidth for ITS applications;
- downgrading ETC user status due to the possibility of interference;
- jeopardizing significant public investments in ETC systems; and
- delaying pending deployment of systems.

IBTTA urges the commission to maintain the flexibility necessary for users to make cost-effective, performance-based choices from among a variety of existing automobile vehicle monitoring technologies.

Forced relocation of applications to another frequency before they are ready to be replaced does not preserve flexibility. Many ETC systems can and do operate very successfully in other portions of the spectrum and a rule requiring agencies to desert bandwidth would pose a hardship. No agency should be forced by government mandate to re-configure existing systems in order to accommodate other commercial applications.

CONCLUSION

IBTTA appreciates the interest of the commission in the effort to secure necessary frequency range for current and future DSRC services. We urge the Commission to now complete this process in an expeditious manner. Substantial resources have been invested in ETC and other ITS uses by toll authorities, public agencies and the private sector. Many are based on current technologies and interim rules. It is thus imperative that proposed changes to these rules be resolved, or else the industry will have fewer incentives to commit the needed financial and staff resources to bring these systems to the motoring public.

Respectfully submitted,



Tim McGuckin, Director
Technology Programs
IBTTA

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